

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 25, 2025

The Honorable George B. Daniels, U.S. District Judge
United States District Court for the S.D.N.Y.
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (in successive tranches) the Exhibits to Plaintiffs' briefs and averments in opposition to Saudi Arabia's motion to dismiss. *See e.g.* ECF Nos. 9885, 9936, 9944, 9973, and 10199. Pursuant to the Court's July 29, 2024 Order, ECF No. 10173, all of Plaintiffs' Exhibits are "judicial documents" to which public access attaches, *Id.* at 9-11, and Plaintiffs are filing them publicly as soon as practicable, subject to only "limited redactions," *Id.* at 1.

Giving effect to the process provided for by the Court's June 17, 2024 Order regarding the efficient filing of (and public access to) digital media files, ECF No. 9923, Plaintiffs yesterday filed on the public docket a total of eleven (11) DVDs containing digital media exhibits. The docketed DVDs contain the following Plaintiffs' exhibits comprising digital media:

Attachment to ECF filing	Pls. Exhibit No.	Bates / Production No.
(1)	Pls. Ex. 10F *	MPS2023-003_upd
	Pls. Ex. 10H *	MPS896-CLIP
	Pls. Ex. 10K *	MPS2023-059
(2)	Pls. Ex.10O †	MPS2023-026
	Pls. Ex.10P †	MPS2023-029-COMP
	Pls. Ex.10Q †	MPS2023-035-CLIP
	Pls. Ex.10R †	MPS2023-050-CLIP
	Pls. Ex. 450 †	MP365-401
(3)	Pls. Ex. 120 **	Deposition of Omar Al-Bayoumi

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April 25, 2025
Page 2

Plaintiffs captured a scanned imprint of each of the eleven (11) DVDs deposited with the Records Management Office yesterday. These DVDs imprints are collated into three distinct sets as attachments to the present letter for ECF filing, as follows:

- (1) Plaintiffs' exhibits (marked *) that previously contained Plaintiffs' provisional redactions (labeled "ppr"), with all redactions now lifted for public filing in unredacted form;
- (2) Plaintiffs' exhibits (marked [†]) filed publicly for the first time, also in unredacted form; and
- (3) Plaintiffs' exhibit (marked **) filed in three parts on separate DVDs, each part containing Plaintiffs' provisional redactions (labeled "ppr") for public filing, subject to Plaintiffs' reservation of rights to challenge or revise later.

In accordance with the Court's Order, these DVD imprints are being filed on the public docket via ECF, accompanied by counsel's contact information in order to facilitate public access to the digital media exhibits contained on the DVDs. ECF No. 9923.

Respectfully submitted,

MOTLEY RICE LLC

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*For the Plaintiffs' Executive Committee for Personal
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*For the Plaintiffs' Executive Committee for Commercial
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Attorneys for Ashton Plaintiffs

cc: The Honorable Sarah Netburn, U.S.M.J.
All Counsel of Record via ECF